NOURSE & BOWLES, LLP Attorneys for Defendant SAMSUN LOGIX CORPORATION One Exchange Plaza At 55 Broadway New York, NY 10006-3030 (212) 952-6200 UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK ALLIED MARITIME, INC., Plaintiff, 08 CIV. 3656 (TPG) - against -SAMSUN LOGIX CORPORATION, **NOTICE OF MOTION** Defendant.

PLEASE TAKE NOTICE that Defendant will move this Court on June 18, 2008 at 10:30 a.m. at 500 Pearl Street in courtroom 26B for an order in accordance with the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty and Maritime Claims Rule E(7): (1) that Plaintiff promptly provide cash security of \$546,850.00 to secure Defendant's counterclaims in the amount of \$546,850.00, failing which Plaintiff's attachment of Defendant's property be vacated and its suit dismissed and (2) for any other and further relief which may be just and equitable.

By Stipulation and Agreement of counsel, Answering papers, if any, are due on June 9, 2008 and Reply papers, if any, are due on June 16, 2008.

No prior request for this relief has been made.

Dated: New York, New York May 29, 2008

NOURSE & BOWLES, LLP

Attorneys for Defendant

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By:\_

John P. Vayda (JV-0339) One Exchange Plaza

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TO: Tisdale Law Offices, LLC Attorneys for Plaintiff 11 West 42nd Street, Suite 900 New York, NY 10036 (212) 354-0025